



U.S. Department of Energy
Office of River Protection

P.O. Box 450
Richland, Washington 99352

02-OSR-0304

Mr. Ron F. Naventi, Project Manager
Bechtel National, Inc.
3000 George Washington Way
Richland, Washington, 99352

Dear Mr. Naventi:

CONTRACT NO. DE-AC27-01RV14136 – OFFICE OF SAFETY REGULATION (OSR)
APPROVAL OF BECHTEL NATIONAL, INC (BNI) AUTHORIZATION BASIS CHANGE
NOTICE 24590-WTP-ABCN-ESH-01-028, REVISION 0

- References:
1. BNI letter from A. R. Veirup, BNI, to M. K. Barrett, ORP, "Transmitted for Approval: Contract Deliverable "Revised Standards Approval Package – Update" and Revision 1 to Associated Authorization Basis Change Notices in Support of the "SRD Standards Approval Package Submittal"," CCN 027626, dated February 5, 2002
 2. BNI letter from A. R. Veirup, BNI, to M. K. Barrett, ORP, "Closeout Comments on Low Activity Waste Construction Authorization Requests," CCN 033570, dated July 3, 2002

The U.S. Department of Energy, Office of River Protection, OSR has reviewed Authorization Basis Change Notice (ABCN) 24590-WTP-ABCN-ESH-01-028, Revision 0, submitted to OSR in Reference 1. The ABCN proposes changes to the Safety Requirements Document (SRD) and involves a modification to the Implementing Codes and Standards for SRD Safety Criterion 4.2-3. Two Implementing Codes and Standards originally proposed by BNFL, Inc. are being deleted and replaced with a BNI Ad-Hoc standard. The standard involves the areas of erosion/corrosion and in-service inspection. Questions were asked of BNI associated with this ABCN, and acceptable answers were transmitted to OSR by Reference 2.

Based upon OSR's evaluation of the proposed changes, OSR has found the proposed changes acceptable. OSR has concluded that there is reasonable assurance that the health and safety of the public and the workers, and the environment will not be adversely affected by those changes, and that they comply with applicable laws, regulations, and RPP-WTP contractual requirements. Attached is OSR's Safety Evaluation Report for the proposed changes.

As part of the amendment implementation process, please submit within 14 days of receipt of this letter the revised pages of the SRD, identifying all revisions to date. This amendment is effective immediately and shall be fully implemented within 30 days, i.e., the provisions of the amendment may be used immediately; within 30 days, controlled copies of the SRD, and subordinate documents must be modified to reflect the changes associated with this amendment.

Mr. Ron F. Naventi
02-OSR-0304

**Safety Evaluation Report (SER)
Of Proposed Authorization Basis Change Notice
24590-WTP-ABCN-ESH-01-028, Revision 0
For the River Protection Project-Waste Treatment Plant
By the Office of Safety Regulation**

1.0 INTRODUCTION

The River Protection Project-Waste Treatment Plant (RPP-WTP) authorization basis is the composite of information, provided by the Contractor in response to radiological, nuclear, and process safety requirements, that is the basis on which the Office of Safety Regulation (OSR) Safety Regulation Official grants permission to perform regulated activities. The authorization basis includes that information requested by the Contractor for inclusion in the authorization basis and subsequently accepted by OSR. The authorization basis for the RPP-WTP includes the Safety Requirements Document (SRD). The SRD contains the approved set of radiological, nuclear and process safety standards and requirements, which if implemented, provide adequate protection of workers, the public, and the environment against the hazards associated with the operation of the facility. By letter dated February 5, 2002, and responses to questions by letter dated July 3, 2002, Bechtel National, Inc., (the Contractor) submitted proposed changes to the SRD in areas involving the Implementing Codes and Standards for SRD Safety Criteria 4.2-3 regarding standards for erosion/corrosion and in-service inspection. This SER documents OSR's evaluation of these changes proposed by the Contractor.

2.0 BACKGROUND

The SRD contains the set of radiological, nuclear, and process safety standards necessary to ensure adequate protection of the health and safety of workers, co-located workers, the public, and the environment from radiological, nuclear, and process hazards. The SRD standards are developed via an iterative process. Included in the development process is a continuing review of industry practices, particularly those referenced in the SRD, and review of the results of the process hazards and accident analyses as they evolve with the design of the facility for potential impacts on the SRD standards used to ensure protection of the public, workers, and the environment.

In ABCN 24590-WTP-ABCN-ESH-01-028, Revision 0, the Contractor has proposed changes to the SRD, involving a modification to the Implementing Codes and Standards for SRD Safety Criterion 4.2-3. Two Implementing Codes and Standards originally proposed by BNFL, Inc. are being deleted and replaced with a BNI Ad-Hoc standard. The standard involves the areas of erosion/corrosion and in-service inspection. Questions were asked of BNI associated with this ABCN, and acceptable answers were transmitted to OSR.

3.0 EVALUATION

3.1 24590-WTP-ABCN-ESH-01-028, Revision 0

3.1.1 Proposed Change to Implementing Codes and Standards for SRD Safety Criterion 4.2-3:

Description of Change:

Under the Implementing Codes and Standards section, delete, “Document P001/2 Rules for the Design of Piping Systems” and “Document V001/2 Rules for the Design of Vessels,” and add, “Ad Hoc Implementing Standard for Erosion/Corrosion and Assessments,” (the Standard) In addition, incorporate the Ad Hoc standard into the SRD as Appendix I.

Evaluation: (Acceptable)

The proposed revision is acceptable because the Standard provides adequate details on how the Contractor will evaluate the effects erosion/corrosion may have on equipment and on actions the Contractor will take when appropriate. Further, the Standard requires that the Contractor make available to DOE six months prior to hot commissioning, an in-service inspection description as to where baseline measurements should be taken. This date will provide adequate time to evaluate the program before implementation is needed. The proposed change is not a reduction in commitment or effectiveness.

4.0 CONCLUSION

Based on OSR’s evaluation of the proposed changes, described above, OSR has found the proposed changes acceptable, and has concluded that there is reasonable assurance that the health and safety of the public and the workers, and the environment will not be adversely affected by the proposed changes. Furthermore, OSR has determined that the proposed changes comply with applicable laws, regulations, and RPP-WTP contractual requirements.

If you have any questions please contact Walt Pasciak, OSR, (509) 373-9189. Nothing in this letter should be construed as changing the Contract, DE-AC27-01RV14136. If, in my capacity as the Safety Regulation Official, I provide any direction that your company believes exceeds my authority or constitutes a change to the Contract, you will immediately notify the Contracting Officer and request clarification prior to complying with the direction.

Sincerely,

Robert C. Barr
Safety Regulation Official
Office of Safety Regulation

OSR:WJP

Attachment